

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE STREET GROUP, LLC

*Plaintiff and Counterclaim-
Defendant,*

v.

MILLENNIUM MANAGEMENT LLC,
DOUGLAS SCHADEWALD, and
DANIEL SPOTTISWOOD

Defendants.

Civil Action No. 1:24-cv-02783

**DECLARATION OF ROLLO C. BAKER IN SUPPORT OF DEFENDANTS'
LETTER OPPOSITION TO JANE STREET'S MOTION FOR A PROTECTIVE
ORDER CONCERNING CERTAIN OF DEFENDANTS' 30(B)(6) TOPICS**

I, Rollo C. Baker, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at the law firm of Elsberg Baker & Maruri, PLLC, and counsel for Individual Defendants Douglas Schadewald and Daniel Spottiswood. I am a member in good standing of the Bar of the State of New York and admitted to practice in the Southern District of New York.

2. I respectfully submit this declaration in support of Individual Defendants and Millennium Management, LLC's (collectively, "Defendants") letter opposition ("Letter Opposition") to Jane Street's motion, Dkt. 232, which seeks to bar Defendants from developing Rule 30(b)(6) and Rule 30(b)(1) deposition testimony on Defendants' Rule 30(b)(6) Topics 17, 18, 23, 24, and 25 ("Topics"). I am personally familiar with the facts included in this declaration.

3. Attached hereto as Exhibit 1 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS02999839–JS02999840.

4. Attached hereto as Exhibit 2 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS02370621–JS02370623.

5. Attached hereto as Exhibit 3 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS02974934–JS02974934.

6. Attached hereto as Exhibit 4 is a true and correct copy of Defendant Millennium’s Responses and Objections to Jane Street’s Supplemental Notice of Rule 30(b)(6) Deposition.

7. Attached hereto as Exhibit 5 are true and correct portions of the transcript from the deposition of Chirag Agrawal dated November 14, 2024.

8. Attached hereto as Exhibit 6 is a true and correct copy of Individual Defendants’ Initial Disclosures.

9. Attached hereto as Exhibit 7 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Number JS00244346.

10. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Number JS02988059.

11. Attached hereto as Exhibit 9 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Number JS02879270.

12. Attached hereto as Exhibit 10 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Number JS02854315.

13. Attached hereto as Exhibit 11 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Number JS03000608.

14. Attached hereto as Exhibit 12 is a true and correct copy of Jane Street’s Responses and Objections to Defendants’ First Set of Interrogatories

15. Attached hereto as Exhibit 13 is a true and correct copy of email correspondence exchanged between counsel for Jane Street and counsel for Defendants regarding various discovery issues.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on November 18, 2024.

/s/ Rollo C. Baker
Rollo C. Baker